

Exhibit A

**IN THE SUPERIOR COURT OF LOWNDES COUNTY
 STATE OF GEORGIA**

**TALESHA SCHELL and
 CASSANDRA PRESLEY,**

Plaintiff,

v.

**PV HOLDING CORP. and
 JOHN DOE,**

Defendants.

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CIVIL ACTION

FILE NO. 2021CV0898

SUMMONS

TO: PV HOLDING CORP.
 C/O CORPORATION SERVICE COMPANY, AS REGISTERED AGENT
 2 SUN COURT, SUITE 400
 PEACHTREE CORNERS, GA 30092

You are hereby summoned and required to file with the Clerk of said Court and serve upon Jody D. Peterman, Plaintiff's attorney, whose address is Jody D. Peterman, LLC, P.O. Box 6010, Valdosta, GA 31603-6010, an answer to the Complaint which is herewith served upon you, within thirty (30) days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This the 3rd day of June, 2021.

/s/ Stacy Barrett
 Dep. CLERK OF COURT

**IN THE SUPERIOR COURT OF LOWNDES COUNTY
 STATE OF GEORGIA**

**TALESHA SCHELL and
 CASSANDRA PRESLEY,**

Plaintiff,

v.

**PV HOLDING CORP. and
 JOHN DOE,**

Defendants.

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CIVIL ACTION

FILE NO. 2021CV0898

COMPLAINT

COME NOW Talesha Schell and Cassandra Presley, Plaintiffs in the above-styled action,
 and file this their Complaint against the Defendants, showing the Court as follows:

1.

Plaintiffs are residents of Lowndes County, State of Georgia.

2.

Defendant PV Holding Corp. is a foreign corporation organized in the State of Delaware.
 Defendant PV Holding Corp. is authorized to and does transact business in the State of Georgia
 and in the State of North Carolina.

3.

Defendant John Doe is a resident of Lowndes County, State of Georgia.

4.

Jurisdiction and venue are proper in this Court.

5.

On or about June 6, 2019, at approximately 1:05 p.m., Plaintiffs had been traveling on Interstate 95 near Rowland, North Carolina, and were on the off ramp leading onto U.S. Highway 301.

6.

On the same date and same approximate time, Defendant John Doe had also been traveling in this same area and was approaching Plaintiffs' vehicle. Defendant John Doe failed to reduce the speed of his/her vehicle, and struck Plaintiffs' vehicle.

COUNT I: DEFENDANT JOHN DOE'S NEGLIGENCE

7.

Plaintiffs incorporate paragraphs 1 through 6 into Count I of this complaint.

8.

Defendant John Doe failed to exercise due care while driving.

9.

Defendant John Doe negligently drove his/her vehicle into Plaintiffs' vehicle.

10.

Plaintiffs had no control over Defendant John Doe's actions.

11.

Due to the manner of the collision, Plaintiffs were unable to avoid the collision.

12.

The proximate cause of the collision was solely the negligence of the Defendant John Doe.

13.

Defendant John Doe was negligent in the following particulars, but not limited to these particulars:

- a. Failure to keep a proper lookout;
- b. Failure to use due care while driving;
- c. Driving too fast for conditions; and
- d. Driving in a manner as to collide with another vehicle.

COUNT II: NEGLIGENCE OF DEFENDANT PV HOLDING CORP.

14.

Plaintiffs incorporate paragraphs 1 through 13 into Count II of this Complaint.

15.

At the time of the accident, Defendant John Doe was employed by Defendant PV Holding Corp.

16.

At the time of the accident, the vehicle driven by Defendant John Doe was owned by Defendant PV Holding Corp.

17.

At the time of the accident, Defendant John Doe was acting in the course and scope of his/her employment and in furtherance of the business of Defendant PV Holding Corp.

18.

Defendant PV Holding Corp. is vicariously liable for the acts and omissions of Defendant John Doe as to the accident involving Plaintiffs.

19.

Defendant John Doe was incapable of safely operating a motor vehicle based on his/her age, intelligence, and/or experience, and based on his prior driving history.

20.

Defendant PV Holding Corp. negligently entrusted its vehicle to Defendant John Doe.

COUNT III: DAMAGES

21.

Plaintiff incorporates paragraphs 1 through 20 into Count III of this Complaint.

22.

As a result of the Defendants' negligence, Plaintiffs have suffered bodily injuries.

23.

Plaintiffs have each incurred medical and medically related bills as a result of the injuries suffered as a result of the Defendants' negligence.

24.

Plaintiffs will each continue to incur medical and medically related bills.

25.

Plaintiffs will each continue to endure pain and suffering.

26.

Plaintiffs will each suffer pain and discomfort in their whole bodies for the rest of their lives. Plaintiffs' injuries are permanent in nature.

27.

Plaintiffs each incurred lost wages as a result of the Defendants' negligence.

28.

The damages suffered by Plaintiffs herein are the direct and proximate result of Defendants' negligent acts.

WHEREFORE, Plaintiffs pray as follows:

- a. That process issue as provided by law;
- b. A trial by jury;
- c. Judgment against the Defendants jointly and severally for medical bills, lost wages, and pain and suffering of Talesha Schell in the amount of \$25,000.00 plus costs;
- d. Judgment against the Defendants jointly and severally for medical bills, lost wages, and pain and suffering of Cassandra Presley in the amount of \$95,000.00 plus costs;
- e. Judgment against Defendants for reasonable attorney's fees and all costs of this action;
- f. Such other and further relief as this Court may deem just and proper.

This the 3rd day of June, 2021.

Jody D. Peterman, LLC
P.O. Box 6010
Valdosta, GA 31603-6010
(229) 247-0386
petermanlawoffice@yahoo.com
dhanson.petermanlaw@gmail.com

/s/ Jody D. Peterman
JODY D. PETERMAN
Attorney for Plaintiffs
Georgia Bar No.: 573552

/s/ Dillon P. Hanson
DILLON P. HANSON
Attorney for Plaintiffs
Georgia Bar No.: 883590

SHERIFF'S ENTRY OF SERVICE

REORDER #11-1785 TON Clerk of Superior State Juvenile Courts

Civil Action # 2021CV0898

Superior Court
State Court

Date Filed 6/4/21

LOWNDES COUNTY

Talesha Schell and Cassandra Presley

Attorney's Address

Jody D. Peterman, LLC
304 N. Ashley Street
Valdosta, GA 31601

Plaintiff

VS.

PV Holding Corp. and

John Doe

Defendant

Name and Address of Party to be Served.

MGA Insurance Company, Inc.

c/o The Prentice Hall Corp System, as Registered Agent

2 Sun Court, Suite 400

Peachtree Corners, GA 30092

Garnishee

SHERIFF'S ENTRY OF SERVICE

I have this day served the defendant personally with a copy of the within action and summons.

I have this day served the defendant by leaving a copy of the action and summons at his most notorious place of abode in this County.

☐ Delivered same into hands of described as follows:
age, about years; weight, about pounds; height, about feet and inches, domiciled at the residence of defendant.☒ Served the defendant MGA Insurance Company, Inc. a corporation
by leaving a copy of the within action and summons with Alisha Smith
in charge of the office and place of doing business of said Corporation in this County.
Summons, Complaint☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class. in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.☐ Diligent search made and defendant not to be found in the jurisdiction of this Court.

This 15 day of June, 2021.

M-E Dig 250/763

DEPUTY

Record ID 2101785

REORDER #11-1785

SHERIFF'S ENTRY OF SERVICE

Civil Action # 2021CV0898

Superior Court
State Court

Date Filed 6/4/21

LOWNDES COUNTY

Talesha Schell and Cassandra Presley

Attorney's Address

Jody D. Peterman, LLC
304 N. Ashley Street
Valdosta, GA 31601

Plaintiff

VS.

PV Holding Corp. and

John Doe

Defendant

Name and Address of Party to be Served.

PV Holding Corp.

c/o Corporation Service Company, as Registered Agent

2 Sun Court, Suite 400

Peachtree Corners, GA 30092

Garnishee

SHERIFF'S ENTRY OF SERVICE

I have this day served the defendant _____ personally with a copy of the within action and summons.

I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place of abode in this County.

☐ Delivered same into hands of _____ described as follows:
age, about _____ years; weight, about _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of defendant.☒ Served the defendant PV Holding Corp a corporation
by leaving a copy of the within action and summons with Aisha Smith
in charge of the office and place of doing business of said Corporation in this County.
Summons, Complaint☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class. in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.☐ Diligent search made and defendant _____ not to be found in the jurisdiction of this Court.This 15 day of June, 2021.M. E. Dig2 01763

DEPUTY

SHERIFF DOCKET PAGE
WHITE-CLERK CANARY-PLAINTIFF PINK-DEFENDANT

**IN THE SUPERIOR COURT OF LOWNDES COUNTY
 STATE OF GEORGIA**

**TALESHA SCHELL and
 CASSANDRA PRESLEY,**

Plaintiff,

v.

**PV HOLDING CORP. and
 JOHN DOE,**

Defendants.

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CIVIL ACTION

FILE NO.: 2021CV0898

SUMMONS

TO: MGA INSURANCE COMPANY, INC.
 C/O THE PRENTICE HALL CORP SYSTEM, AS REGISTERED AGENT
 2 SUN COURT, SUITE 400
 PEACHTREE CORNERS, GA 30092

You are hereby summoned and required to file with the Clerk of said Court and serve upon Jody D. Peterman, Plaintiff's attorney, whose address is Jody D. Peterman, LLC, P.O. Box 6010, Valdosta, GA 31603-6010, an answer to the Complaint which is herewith served upon you, within thirty (30) days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This the 4th day of June, 2021.

/s/ Stacy Barrett

Dep. CLERK OF COURT